



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

February 23, 2024

By ECF

Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,
12-CV-6421 (KMK)

Dear Judge Karas:

The Securities and Exchange Commission ("SEC") and Defendant Edward Bronson (Bronson") write to provide an update to their January 11, 2024 letter ("Jan. 11 Letter"). DE 577. As background, the Court ordered the SEC to provide its current views on Bronson's December 1, 2023 Letter and his more recent submissions, DE 572, 573, et al. On January 11, the parties submitted the Jan. 11 Letter, advising that while the SEC continues to have concerns about the Bronsons' compliance with certain Court Orders, the parties are actively discussing if we may be able to resolve these concerns without further Court intervention. The parties then submitted, and the Court entered, an Order concerning the contours of the Court's asset freeze and its Orders regarding notice of cash receipts and disbursements.

The parties have not yet resolved the open issues. Bronson continues to make payments. Notwithstanding these payments, Bronson continued to violate the Court's Order concerning notifying the SEC of certain cash receipts by failing to notify the SEC when he receives funds other than certain salary. DE 582. Bronson advises that he misunderstood the Order but will comply going forward. The SEC continues to have concerns about the source and amount of Bronson's income and therefore plans to conduct additional post-judgment discovery. To avoid unnecessarily using the Court's time, the SEC respectfully suggests that it continue to work with Bronson and conduct post-judgment discovery. After completing a review of documents to be subpoenaed and depositions, the SEC will update the Court and seek any measured relief warranted. The SEC requests to update the Court on May 10, which will allow the SEC sufficient time to complete discovery on these issues.

Respectfully submitted,
s/ Maureen Peyton King

Granted.

So Ordered.

A handwritten signature in black ink, appearing to be "KMK", written over the words "So Ordered." and the date "2/23/24".

2/23/24